INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Governor

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Commissioner

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Mr. Mark Lennart
Karl Schmidt Unisia, Inc.
2425 Coliseum Boulevard South
Fort Wayne, Indiana 46803

February 14, 2003

Dear Mr. Lennart:

Re: Exempt Construction and Operation Status,
003-16987-00064

The application from Karl Schmidt Unisia, Inc., received on January 6, 2003, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the construction and operation of the following equipment, to be located at 2425 Coliseum Boulevard South, Fort Wayne, Indiana, is classified as exempt from air pollution permit requirements:

(a) one (1) spray booth (SB_1), with a maximum capacity of 3 molds per hour and 3 ladles per hour, using air atomization applicators, equipped with paper filters for particulate control and exhausting to the atmosphere.

The following conditions shall be applicable:

(1) Pursuant to 40 CFR 52 Subpart P, the PM from the one (1) spray booth (SB_1) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(2) Pursuant to 326 IAC 6-3-2(d) and in order to comply with the condition above, the paper filter for particulate control shall be in operation in accordance with manufacturer's specifications and control emissions from the spray booth at all times when the one (1) spray booth (SB_1) is in operation. This requirement to operate the control device is not federally enforceable.

(3) Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the paper filters, weekly observations shall be made of the overspray from the surface coating booth stack while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

(4) To document compliance with the monitoring condition, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

This existing source was issued a FESOP (F003-5869-00064) on December 9, 1996. This source became subject to the Part 70 permit program upon installation of the equipment permitted under Second Significant Permit Revision No. 003-13612-00064, issued on August 20, 2001. The source submitted their Part 70 permit application (T003-15163-00064) on November 15, 2001. The equipment being reviewed under this permit shall be incorporated into Part 70 permit No. T003-15163-00064 upon its issuance.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

AB/EVP

cc: File - Allen County
Allen County Health Department
Air Compliance - Jennifer Dorn
Permit Tracking
Air Programs Section- Michelle Boner
Part 70 Application File - T003-15163-00064

Appendix A: Emissions Calculations
Particulate
From Surface Coating Operations

Company Name: Karl Schmidt Unisia, Inc.
Address City IN Zip: 2425 Coliseum Boulevard South, Fort Wayne, IN 46803
Permit ID: 003-16987-00064
Reviewer: Alic Bent/EVP
Date: January 23, 2003

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	% Dilution with Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Particulate Potential (ton/yr)	Transfer Efficiency
Molds								
Dyecoat #8	15.9	NA	50.0%	46.50%	0.06250	3.000	2.28	65%
Dyecoat #34	14.2	NA	50.0%	60.80%	0.06250	3.000	2.04	65%
Dyecoat #36	11.7	NA	50.0%	47.20%	0.06250	3.000	1.68	65%
Dyecoat #39	15.9	NA	50.0%	65.80%	0.06250	3.000	2.28	65%
Boron Nitride (blue)	8.5	92.00%	100.0%	8.00%	0.06250	3.000	0.20	65%
Boron Nitride (white)	8.5	92.00%	100.0%	8.00%	0.06250	3.000	0.20	65%
Frankkoat	23.0	NA	50.0%	100.00%	0.06250	3.000	3.31	65%
Red-kote	10.4	NA	50.0%	50.00%	0.06250	3.000	1.50	65%
Ladles								
Dyecoat #8	15.9	NA	50.0%	46.50%	0.03130	3.000	1.14	65%
Dyecoat #34	14.2	NA	50.0%	60.80%	0.03130	3.000	1.02	65%
Dyecoat #36	11.7	NA	50.0%	47.20%	0.03130	3.000	0.84	65%
Dyecoat #39	15.9	NA	50.0%	65.80%	0.03130	3.000	1.14	65%
Boron Nitride (blue)	8.5	92.00%	100.0%	8.00%	0.03130	3.000	0.10	65%
Boron Nitride (white)	8.5	92.00%	100.0%	8.00%	0.03130	3.000	0.10	65%
Frankkoat	23.0	NA	50.0%	100.00%	0.03130	3.000	1.66	65%
Red-kote	10.4	NA	50.0%	50.00%	0.03130	3.000	0.75	65%

Potential Emissions **Add worst case coating to all solvents** **4.97**

METHODOLOGY

The spray booth coatings do not contain any VOCs. The MSDS submitted by the source have been checked to verify this.
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (coatings concentration) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Total = Worst Coatings